



MEMO ENDORSED
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September 18, 2007

USDC SDNY
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Honorable Richard M. Berman United States District Judge
United States District Court For the Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Jose Yonny Urena
07 MJ 00964 / 07 Cr. 596**

Dear Judge Berman:

This matter was scheduled for our submission of motion to dismiss for September 17, 2007.

However, Mr. Guttein is being held for hearings and trial in *People v. Arigel Ramirez* at New York Supreme Court, Bronx County, #03214-2006. The hearings and trial in this matter are scheduled to continue until at or around Monday, October 1, 2007.

Therefore, we respectfully request that the above captioned matter be adjourned for 15 days until Wednesday, October 3, 2007 for submission of said motion.

The government does not oppose our request providing the time is excludable.

We thank the Court for considering our request and for your attention to this matter.

Respectfully,
Jorge Guttein & Associates

By:

Jorge Guttein, Esq.

JG/ki

Cc: Via Facsimile (212) 637-2527
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07 Cr. 596

<u>Application Granted:</u>	
Defense motion due 10/3/07;	
Govt response due 10/24/07;	
Def. reply due 10/31/07.	
(Page limits apply)	
SO ORDERED:	 Richard M. Berman
Date: 9/19/07	
Richard M. Berman, U.S.D.J.	